



March 15, 2018

Repp Law Firm
1629 K Street, N.W., Suite 300
Washington, D.C. 20006-1631
T 202.656.1619
F 202.400.3737
marissa@repplawfirm.com
www.repplawfirm.com

Via Electronic Filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Communication with Alison Nemeth,
Media Advisor to Chairman Ajit Pai
RM-11727 (FM Class C4)
RM-11643 (Involuntary Interference Protection to Section 73.215 Contour)
MB Docket No. 13-249 (Revitalization of the AM Radio Service)**

Dear Ms. Dortch:

The following meeting summary is submitted pursuant to 47 C.F.R. Section 1.1206(b)(1).

On March 14, 2018, Dan Dukes, Senior Director, Government Affairs, iHeartCommunications, Inc. (together with iHeartMedia + Entertainment, Inc., “iHeart”), met with Alison Nemeth, Media Advisor to Chairman Ajit Pai.

On the topic as to whether the Commission should create a new C4 FM station class, Mr. Dukes expressed iHeart’s concerns with a triggering system, which would result in current radio stations with under-maximum facilities facing significant costs to upgrade or relocate facilities. Moreover, such a triggering system would impede radio stations’ ability to relocate, and stations unable to modify facilities due to factors beyond their control would face losing existing listeners. Mr. Dukes noted iHeart’s previous comments as to the unintended consequences of such a contour-based interference protection system.¹

¹ iHeart participated previously in a Joint Statement with other broadcasters noting the detriments to the public and the FM band of the SSR Communications, Inc. proposal to limit interference protection for all FM stations to the contour protections of Section 73.215, rather than protection to the maximum class facilities. *See* RM-11643, Joint Statement of Beasley Broadcast Group, Inc., Bryan Broadcasting Corporation, Clear Channel Communications, Inc.,

Marlene Dortch, Secretary
March 15, 2018
Page 2

In regard to the Commission's AM Revitalization proceeding, Mr. Dukes noted iHeart's endorsement of improvements to the AM band that have industry consensus support, and noted iHeart's participation in comments in that proceeding that evaluated non-consensus proposals that would create additional interference in the AM band, with resulting loss of service to the public.

Respectfully submitted,

REPP LAW FIRM

By: 
Marissa G. Repp

Counsel to iHeartCommunications, Inc.

cc: Alison Nemeth (via e-mail)
Dan Dukes (via e-mail)